IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANCIS SANTIAGO,

Plaintiff,

Civil Action No. 02-4048

v.

GMAC MORTGAGE GROUP, INC., GMAC RESIDENTIAL HOLDING CORP., and GMAC MORTGAGE CORPORATION,

Defendants.

PLAINTIFF'S COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Plaintiff's Counsel in the above-captioned action, Milberg Weiss LLP; Barrack, Rodos & Bacine; Lerach Coughlin Stoia Geller Rudman & Robbins, LLC; The Law Offices of Michael Huber; and Packard, Packard & Johnson, respectfully move the Court for an award of attorneys' fees and expenses of \$325,000.00. The basis for this Motion is fully set forth in the accompanying Memorandum of Law and the Declaration of Jennifer L. Young, which are being filed concurrently herewith.

Respectfully submitted:

MILBERG WEISS LLP

Jennifer L. Young Barry A. Weprin

One Pennsylvania Plaza New York, NY 10119 Telephone: (212) 594-5300 Facsimile: (212) 868-1229

PACKARD, PACKARD & JOHNSON

Craig H. Johnson

2795 E. 2825 Cottonwood Parkway, Suite 500

Salt Lake City, UT 84121 Telephone: (801) 428-9000 Facsimile: (801) 428-9090

Ronald D. Packard

Four Main Street, Suite 200

Los Altos, CA 94022

Telephone: (650) 947-7300 Facsimile: (650) 947-7301

LAW OFFICES OF MICHAEL HUBER

Michael E. Huber

8170 South Highland Drive, Suite E5

Sandy, UT 84093

Telephone: (801) 733-5807 Facsimile: (801) 733-0132

BARRACK, RODOS & BACINE

Jeffrey W. Golan 3300 Two Commerce Square 2001 Market Street Philadelphia, PA 19103

Telephone: (215) 963-0600 Facsimile: (215) 963-0838

LERACH COUGHLIN STOIA
GELLER RUDMAN & ROBBINS LLP

John J. Stoia, Jr. Timothy G. Blood 401 B Street, Suite 1700 San Diego, CA 92101 Telephone: (619) 231-1058

Facsimile: (619) 231-7423

Counsel for Plaintiff